Wiltshire Council Planning Consultation Response

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Application No: **PL/2023/09161(LBC) & PL/2023/08718**
Remove modern conservatory to rear, replace modern dormer to rear, relocate kitchen and general refurbishment.
25 St Margarets Street, Bradford On Avon

Please find following comments in respect of the above application(s).

Recommendations:

	No comment
X	Support in principle subject to amendments to the scheme (as set out below)
	Support subject to conditions (as set out below)
	Object (for reasons set out below)
	No objections

Scope of comments: the following comments relate to the built historic environment.

Policy: From the point of view of the historic environment the main statutory tests are set out within the Planning (Listed Building and Conservation Areas) Act 1990. Sections 16 (LBC) and 66 (PP) require that **special regard** be given to the desirability of preserving listed buildings, their settings or any features of special architectural or historic interest which they possess.

Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 also requires the Council to pay **special attention** to the desirability of preserving or enhancing the character or appearance of designated Conservation Areas.

The NPPF outlines government policy, including its policy in respect of the historic environment. Section 16 of the NPPF 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development. Paragraphs 201-3 of the NPPF require a balanced approach with any harm which would be caused being weighed against the potential public benefits which might be achieved.

The Council's Core Strategy Policy CP58 'Ensuring the conservation of the historic environment' requires that "designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance."

Historic England Advice Note 2 – Making changes to Heritage Assets illustrates the application of policies set out in the NPPF in determining applications for PP and LBC.

Site and assets considered: the site relates to a listed building within a terrace which is located within the conservation area and the impact on the listed building itself and the setting of the adjacent building and character and appearance of the conservation area have been taken into account.

Proposal: The applications have been submitted with a single description of development. Thess should be amended to suit the consents in question. So – listed building consent is required for the removal of the modern conservatory to rear, replacing the dormer to rear, relocating the kitchen and other items of general refurbishment described. Planning permission is presumably only require for the erection of the new fence panel and potentially for the replacement dormer window, which has a different roof form to the existing?

Issues: impact on the listed building, impact on the setting of neighbouring listed buildings, impact on the conservation area.

Information considered/provided: Paragraph 194 requires that applicants describe the significance of any heritage assets affected, including any contribution made by their setting. This should include sufficient information to provide a clear understanding of the significance of the heritage asset and its setting and the potential impact of any proposals on that significance. In this case, the applications are accompanied by a "Design and Heritage Statement" which provides sufficient information to understand the impact of the proposals and is proportionate to their scope. The requirements of the NPPF are therefore met in this respect.

Significance of assets and contribution of setting (as appropriate): The NPPF defines significance as the "value of a heritage asset to this and future generations because of its heritage interest. The interest may be **archaeological**, **architectural**, **artistic** or **historic**. Significance derives not only from a heritage asset's physical presence, but also from its setting." Historic England assesses significance in a similar manner, referring to evidential, historic, aesthetic and communal values of a place.

In this case the significance of the building lies largely with its historic fabric and architecture - its form, layout and architectural expression/detailing and use of high-quality design materials which have significant aesthetic and architectural interest and which contribute to the character of the conservation area.

Assessment: the application covers a number of different proposals and these are most easily dealt with in turn:

- Removal of the modern conservatory – this structure has no significance and is a modern intervention. Its replacement will better reveal the form of the building and the proposal is therefore an enhancement. Details will be required for any proposed making good including removal of paint from the area revealed. These could be conditioned.
- Replacement of the existing dormer – the existing window is a poorly detailed structure which detracts from the overall elevation. Whilst the dormers are larger than is ideal, they are long established structures and replacement to a more traditional form is therefore welcomed. Final joinery details for the new window are required. These could be conditioned.
- Relocation of the kitchen (and creation of utility at lower ground floor)– relocation of a kitchen to a formally designed and principle reception room is not ideal. However, the scheme has been designed with care and the new units are designed to appear as free-standing furniture. The traditional symmetrical arrangement of fireplace and niches to either side will remain unaffected. The joinery here appears modern and its replacement is uncontroversial. As the kitchen lies above the existing kitchen there should be limited harm involved in the extension of services. Overall, the harm that may result from the change of use of a formal reception room has been appropriately mitigated. It is noted that the utility room at Lower Ground Floor will be in a location which is currently without services and a condition is therefore required to secure details of any new service runs and of any additional vents and extracts which may be required as a result of the new uses.
- Heating – no details are provided for the proposed new heating system but the photos suggest that radiators are already in place and this merely constitutes a replacement boiler. There is no objection to this although details of proposals for a vent should be submitted under the condition suggested above.

- Joinery to undercroft window/door – joinery details will be required.
- Fence – the wish for a privacy screen is understood in this location but a standard close-boarded or panel fence would be out of character in the context of the architecture and I would suggest that details of this and the railing be conditioned, Ideally, the panel would be of a more formal architectural design and possibly in painted timber to complement the setting.

Summary & conclusion: The NPPF confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). It makes clear that any harm to a designated heritage asset requires clear and convincing justification.

Subject to the details suggested as being required above, the impact of the proposals on heritage assets will be largely neutral or positive and the requirements of current conservation legislation, policy or guidance are considered to be met and there is therefore no objection to the approval of the application.